



WESTON SOLUTIONS, INC.
205 CAMPUS DRIVE
EDISON, NEW JERSEY 08837
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VIA FEDEX

March 31, 2020

Mr. Ben Conetta, Chief
Corrective Action Section
Hazardous Waste Programs Branch
U.S. EPA Region 2
290 Broadway, 25th Floor
New York, New York 10007-1866

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, NJ 07095

Re: Hatco Site
Fords, NJ
Program Interest Number G000003943

Dear Mr. Conetta and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 58, which covers the activities associated with the Hatco Site from December 1, 2019 through February 29, 2020. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in blue ink, appearing to read "Jason Schindler", with a stylized, sweeping flourish at the end.

Jason Schindler
Principal Project Manager

cc: S. Ferreira, (USEPA)
A. Findley (NJDEP)
M. Fisher – LSRP (ELM)
R. Ansari, A. Martin, E. Ostapczuk (Hatco/LANXESS)
M. DiNinno (MCUA)
V. Puranapanda (CHUBB)



ADMINISTRATIVE CONSENT ORDER PROGRESS REPORT

1. Progress Report Number: 58
2. Site Location: Hatco Site
1020 King Georges Post Road
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
New Jersey Department of Environmental Protection
4. Reporting Period: December 1, 2019 through February 29, 2020
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report Number 57 on December 30, 2019.
 - 5.2 Weston provided monthly progress updates by email to the United States Environmental Protection Agency (USEPA) on January 7, February 6, and March 2, 2020.
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Weston continued light non-aqueous phase liquid (LNAPL) recovery operations. Weston conducted recovery operations at the site using automated skimmer pumps and manual bailers. Total recovery through the end of this reporting period:
 - 10,309 gallons of LNAPL recovered using skimmer pumps and bailers since March 2011;
 - 3,200 gallons recovered and shipped offsite in liquid phase during the Southeast Leg remediation; and
 - 25,000 gallons estimated in LNAPL-saturated soils shipped for offsite disposal during the Southeast Leg remediation.
 - 6.2 Monthly progress meetings with the Licensed Site Remediation Professional (LSRP).
 - 6.3 Evaluation of properties adjacent to the Channel D/AOC 25 area, south of Riverside Drive, has identified several other likely sources of contamination to AOC 25. Weston is working with the property owners to evaluate these conditions.
 - 6.4 Weston prepared the draft pre-design sampling plan to confirm the limits of site-wide cap and a draft 30% design for the site-wide cap. Weston and LANXESS are working to confirm that the proposed approaches are consistent with the needs of the operating facility and to finalize the plans and associated permit applications.
 - 6.5 An emergency permit modification to address additional streambank erosion in Slingtail Creek was granted by NJDEP on October 23, 2019. Work began on February 24, 2020.
 - 6.6 Weston has completed the remediation of Hatco-related contaminants identified in Woodbridge Pond sediments (Hatco AOC 24). The final walk through with

Woodbridge Township, the property, owner was completed on September 27, 2019. Weston is currently preparing the Remedial Action Report for AOC 24.

- 6.7 During the Woodbridge Pond remediation project an isolated area of PCB-contaminated sediment was identified in the wetland portion of the adjacent Crown Relocators property (part of Hatco AOC 23). Weston is preparing the permit modification application necessary to remove the isolated area of PCB-contamination identified.
 - 6.8 Water was observed seeping out of the ground at the decommissioned seep interceptor vault system. Iron staining was noted on the surface of the surrounding pavement. No evidence of LNAPL or PCB exceedances were detected in the sample of water from the vault. Weston pumped out the vault on February 3, 10, 13, 18 and 28 to prevent further seepage and is working with LANXESS to develop a permanent solution for the situation.
 - 6.9 Weston is continuing preparation of the remedial action progress reports for the ongoing remediation projects.
 - 6.10 On September 19, 2019, Weston and the LSRP worked with NJDEP to combine the regulatory case involving the discharge to the reconstructed onsite wetlands (reported on June 19, 2018; Case No. 18-06-22-1109-21) with the Hatco remediation project. Weston has prepared the sampling plan to assess the onsite wetland; the plan was submitted to USEPA for review on January 30, 2020. USEPA and NJDEP provided comments on February 11, 2020. Weston provided a response to the comments on March 13, 2020.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
- 7.1 Update scope and schedule for Channel D remediation.
 - 7.2 Slingtail Creek streambank armoring.
8. Explanation for Each Item of Non-Completion in Item 7:
- 8.1 Weston is currently in discussions with the property owners for Channel D and will update the scope and schedule based on those discussions.
 - 8.2 Streambank armoring was originally scheduled for January/February. The work was delayed, in part, due to a period of heavy rain that prevented construction within the stream channel. The work was completed in March.
9. Specific Requirements to be Initiated in Next Reporting Period (March - May 2020):
- 9.1 Continue preparation of Southeast Leg, Northeast Impoundment, and Former Lagoon Cap Remedial Action Progress Reports, and Woodbridge Pond Remedial Action Report.
 - 9.2 Continue preparation of engineering plans for site-wide capping of remaining contaminated soil. Implement site-wide sampling plan.
 - 9.3 Implement Southeast Leg Pond Area Sampling Program.